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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KRISTOPHER THOMAS,
CHARMANE DOZIER,
KETTISHA THOMPSON-DOZIER, and
SHARON VANCE

Defendants.

CASE NO. 5:24-MJ-00007-CDB

STIPULATION TO CONTINUE PRELIMINARY
HEARING AND EXCLUDE TIME

The parties stipulate as follows:

1. The complaint was issued in this case on February 14, 2024, and the defendants subsequently made their initial appearances. The preliminary hearing was scheduled for May 23, 2024, with an appropriate time exclusion so that defense counsel could review discovery and consider pre-indictment resolutions of the case.
2. The government has produced initial discovery to defense counsel. The discovery is over one million pages, and it includes detailed financial records, text messages, emails, and other correspondence, and interview reports.
3. The parties now agree to further continue the preliminary hearing until July 18, 2024.
4. The parties agree that good cause exists for the continuance because the extension is required to allow defense counsel reasonable time to complete their review of the discovery, prepare for

any litigation, and fully consider a pre-indictment resolution of the case.

5. The parties agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial. The parties also agree that the period from May 23, 2024, through July 18, 2024, should be excluded. Fed. R. Crim. P. 5.1(d); 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO STIPULATED.

Dated: May 3, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Joseph Barton

Joseph Barton
Assistant United States Attorney

Dated: May 3, 2024

/s/ Peter Jones

Peter Jones
Counsel for Kristopher Thomas

Dated: May 3, 2024

/s/ Christina Corcoran

Christina Corcoran
Counsel for Charmane Dozier

Dated: May 3, 2024

/s/ Serita Rios

Serita Rios
Counsel for Kettisha Thompson-Dozier

Dated: May 3, 2024

/s/ Victor Nasser

Victor Nasser
Counsel for Sharon Vance

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Defendants.

CASE NO. 5:24-MJ-00007-CDB
~~PROPOSED~~ ORDER

The Court has read and considered the parties' stipulation to further continue the preliminary hearing in this case and exclude time. The Court finds there is good cause for the continuance so as to allow defense counsel reasonable time to complete their review of the discovery, prepare for any litigation, and fully consider a pre-indictment resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendants in a speedy trial. Therefore, for good cause shown:

1. The preliminary hearing is continued from May 23, 2024, until July 18, 2024, at 2:00 p.m., and the defendants shall appear then before the Fresno duty magistrate judge; and

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2. The period from May 23, 2024, through July 18, 2024, shall be excluded pursuant to Federal Rule of Criminal Procedure 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) for the reasons set forth in the parties' stipulation.

3. **No further stipulated requests for a continuance of the preliminary hearing will be entertained in this action without convening for an in-person hearing to consider the parties' request and showing of good cause.**

IT IS SO ORDERED.

Dated: May 3, 2024


UNITED STATES MAGISTRATE JUDGE